

Colorado Department of Public Health and Environment
Informal Comments
Draft Chapter 5, Pond Water IM/TRA

1) We have previously expressed our reluctance to consider flow-through as a viable short-term alternative. We continue to feel that an uncontrolled/undetected release getting through the system presents an unacceptable risk, no matter how small the probability of such a release. We feel the only real short-term options are those that maintain and improve the batch isolation system, including

- improving dam integrity to enable increased volume retention
- decreasing discharge cycle requirements by incorporating new analytical methods with quicker turnaround times
- justifying and improving where possible, maximum draw down rates
- incorporating water consumptive and recycling measures to reduce the amount of influent and stored waters in the pond system, can be applied to all sources of water entering the pond system

Several of these can be implemented immediately and inexpensively

DOE has much work ahead before a flow-through system can be "phased in". DOE's preference to intentionally route hazardous wastes to the STP, coupled with the limited NPDES analytical suite, render its direct discharge inappropriate at this time (silver discharge on 7/8/94 is a good example). There is no real time analytical monitoring equipment for meaningful indicator parameters, namely Pu/Am. As a result, any variation on the flow through scheme really isn't a short-term option. Despite this, four of the six alternatives presented in your submittal, which are clearly identified as short term in nature, are flow-through.

DOE has not by any means exhausted its options to maintain and improve the batch process. Flow-through will be considered only when DOE is left with no other choices.

2) The matrix is a good thought, and we support a method that would allow an unbiased evaluation of alternatives. If DOE chooses to use this matrix, we require a detailed justification of the ranking factors assigned to each criteria. It seems though, that the evaluation criteria are weighted in such a way as to favor the flow-through alternatives. Only criteria 1 and 6 support batching, with criteria 2, 3, 4, and 5 clearly supporting flow-through. Simple algebra shows which way this is headed. We would argue that achieving the Segment 4 standards assures protection of functional ecologies (and that Segment 4 standards should have a much higher weighting factor), and that criteria 4 and 5 are identical. We reserve the right to reject an alternative chosen on the basis of an evaluation mechanism that is predispositioned.

3) Any facility that manages RCRA hazardous waste will be required to meet the substantive requirements of RCRA, including (but not limited to) secondary containment.

4) The costs associated with treatment and monitoring upgrades will far exceed implementation of measures listed in comment number 1. We encourage DOE to pursue simple, non-capital intensive alternatives.

5) Who requires a formal biological assessment of the selected alternative? What ecosystem is being protected? Has DOE considered that the current batching configuration is more like the ambient conditions in existence before DOE was ever there (intermittent flow)? It will be difficult to prove a continuous flow system is better for functional ecologies when such conditions have never occurred there.

6) All off-spec waters, be they spills or storm water, should go to the tankage as the first choice. Coordination with the Industrial Area IM/TRA will be necessary on this point.

September 6, 1994